

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 2100 & 2192

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER (I) AUTHORIZING
THE DEBTORS TO (A) REJECT CERTAIN UNEXPIRED LEASES EFFECTIVE AS OF
FEBRUARY 28, 2025 AND (B) ABANDON CERTAIN PERSONAL PROPERTY AND (II)
GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 9, 2024, the Court entered the *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* (D.I. 461) (the “**Lease Rejection Procedures Order**”).

2. Pursuant to the Lease Rejection Procedures Order, on February 26, 2025, the Debtors filed the *Sixteenth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property)* (D.I. 2100) (the “**Sixteenth Rejection Notice**”).

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

3. The deadline to object to the Sixteenth Rejection Notice was March 10, 2025, at 4:00 p.m. (ET) (the “**Objection Deadline**”).

4. Prior to the Objection Deadline, on March 10, 2025, Town N’ Country Plaza, LLC f/k/a Town N. Country Plaza L.P. (“**Town N’ Country**”) filed the *Limited Objection of Town N’ Country Plaza, LLC f/k/a Town N’ Country Plaza, L.P. to Debtors’ Sixteenth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property) [D.I. 2100]* (D.I. 2192) (the “**Objection**”) with regard to the Debtors’ proposed rejection of the lease for Store #547 located at 7565 W. Hillsborough Ave., Tampa, Florida (the “**Lease**”).

5. The Debtors and Town N’ Country engaged in discussions to resolve the Objection and have negotiated a proposed form of order to reject the Lease as of February 28, 2025 (the “**Revised Proposed Order**”).

6. The Revised Proposed Order is attached as **Exhibit 1** hereto. For the convenience of the Court and all parties in interest, a redline comparing the Revised Proposed Order to the form of order filed with the Sixteenth Rejection Notice is attached hereto as **Exhibit 2**.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: April 10, 2025
Wilmington, Delaware

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